

Exhibit A

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6 *Attorneys for Defendants*

UBER TECHNOLOGIES, INC.,

7 RASIER, LLC, and RASIER-CA, LLC

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 IN RE: UBER TECHNOLOGIES, INC.,
12 PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

Judge: Honorable Charles Breyer

11 This Document Relates to:

12 ALL ACTIONS

**DECLARATION OF DALENE BRAMER
IN SUPPORT OF DEFENDANTS' BRIEF
REGARDING AUGUST 22, 2025
CLAWBACK PURSUANT TO SPECIAL
MASTER ORDER NO. 4, § III**

13 **DECLARATION OF DALENE BRAMER**

14 I, Dalene Bramer, having personal knowledge of the following state:

15 1. My current title is Senior Legal Director, Driver Policy, at Uber, a position I have
16 held since January 2020. I was first employed by Uber in May 2014 and have worked as in-house
17 counsel there for over eleven years. My previous roles include Chief of Staff to the Chief Legal
18 Officer; Legal Director, Employment; Senior Counsel, Employment; and Employment Counsel. In
my current role, as has been the case throughout my tenure at Uber, I am responsible for providing

DECLARATION OF DALENE BRAMER IN SUPPORT OF DEFENDANTS' BRIEF REGARDING AUGUST 22,
2025 CLAWBACK PURSUANT TO SPECIAL MASTER ORDER NO. 4, § III

Case No. 3:23-MD-3084-CRB

1 legal advice to Uber’s executive leadership team and the Board of Directors regarding litigation,
2 product, policy and regulatory advice related to the driver’s status as independent contractors. I
3 offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies,
4 Inc., Rasier, LLC, and Rasier-CA, LLC’s Brief Regarding August 22, 2025 Clawback Pursuant to
5 Special Master Order No. 4 § III (ECF 2933). The facts set forth herein are true and correct and are
6 based on my own personal knowledge, and I could and would competently testify thereto if called.

7 2. I am familiar with the document identified as JCCP_MDL_PRIVLOG080062, which
8 is a Q2 Board of Director’s Update on “AB5,” at the time, a new bill signed into law in California
9 that laid out new criteria for who would be classified as employees of a company under California
10 law. I was tasked to evaluate and lead litigation, product and policy strategy related to our legal
11 response to AB5. At the top of each page of the document, it is stamped “Attorney Client Privileged
12 & Confidential.” I drafted this confidential legal update for the Board of Directors for the purpose of
13 informing and advising them about the critical legal implications the passage of this bill would have
14 on Uber, including potential exposure in future litigation, product changes and possible regulatory
15 and policy strategies to counter the impact of AB5. JCCP_MDL_PRIVLOG080062 accurately states
16 that it is attorney-client privileged and confidential.

17 3. Indeed, the metadata of the file accurately indicates that I am the sole author of this
18 document. I personally drafted slides 1-12 and 27-30. Slides 13-25 and 31-34 were drafted at my
19 sole direction and with my oversight and editing. The deck was prepared to provide legal guidance
20 on the passage of AB5. The document includes factual information, litigation analysis, product
21 changes and campaign information related to running a ballot initiative as a legal strategy in
22 response to AB5 that I prepared and collected to inform the board on behalf of the legal team on the
23 legal risks and potential risk mitigations related to AB5. The document as a whole includes my

1 mental impressions and opinions about the impact of AB5 and my legal recommendations for the
2 company. The document was ultimately shared with Tony West, our Chief Legal Officer, and he
3 presented this information to the Board as a reflection of the legal department's advice.

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct.

6 Executed on September 5, 2025

By: Dalene Bramer

Dalene Bramer